

## **REMARKS/ARGUMENTS**

Claims 1-33 are currently pending in the application, all of which stand rejected. No claims have been amended, added or canceled herein.

### **1. Rejection of Claims 1-33 Under 35 U.S.C. §103(a)**

Claims 1-33 have been rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent Application Publication No. 2004/0054688 to Tran (hereinafter "Tran") in view of U.S. Patent Application Publication No. 2002/0087679 to Pulley et al. (hereinafter "Pulley").

Independent claim 1 is directed to a method for tracking issues. The claimed method includes a combination of steps, comprising: "providing a log-in page to log-in a user; receiving user information from the user in the log-in page; providing one of a plurality of interface pages to process an issue, wherein the interface page has a configuration corresponding to a predetermined access level of the user; providing an issue record; and providing an embedded uniform resource locator of the issue record."

It is submitted that the cited references, Tran and Pulley, alone or in combination, do not render claim 1 obvious. In particular, it is submitted that neither of the cited references provide a teaching of the claimed providing an embedded URL. Furthermore, it is submitted that the Examiner has not articulated a clear reasoning for why one of skill in the art would combine the cited references in the claimed manner.

With respect to the references, Tran is directed to controlling a component list in an issue tracking system. The system of Tran provides a database that is used to store the component list and issues that are related to each of the components. Importantly, the system of Tran is directed to a database that includes the component list. For example, as described at paragraph [0032], if a user desires to search issues, a database query is entered by the user, as illustrated in Fig. 6B, with the results of a query displayed as illustrated in Fig. 6C. This discussion, along with the illustrated screen, are of a traditional database type query and at no point disclose an embedded

URL of an issue record. In fact, Tran is completely devoid of any discussion of providing an embedded URL of an issue record.

Pulley is directed to monitoring of web page activity, and it is submitted that this reference is not properly combinable with Tran for the purposes of rendering claim 1 obvious. Specifically, Pulley is devoid of any discussion of issue tracking, or of providing any URLs related to any records, and Applicants fail to understand why one of skill in the art would look to Pulley in the context of the invention of claim 1. Furthermore, even if Pulley were properly combinable with Tran, this reference does not teach or suggest the claimed providing an embedded URL. Pulley is concerned with providing a real-time view of traffic on an electronic-commerce website that may then be used in real-time decision making related to the various pages, promotions, etc. associated with the website. As described at paragraph [0053], real-time monitoring allows a user to "identify any immediate effects due to changes made in one or more pages, watchlists and/or categories of a website or in view of the release of one or more ad campaigns." Pulley goes on at some length discussing the collection and aggregation of website activity, with this information displayed in a graphical format, but does not have any disclosure related to issue tracking, issue records, or of providing an embedded URL of an issue record.

The Examiner asserts that Pulley, at paragraph [0098] teaches providing an embedded uniform resource locator of an issue record. However, a close reading of the noted portion of Pulley reveals that no such teaching is provided. Paragraph [0098], discusses the configuration of aggregation subsystems within a website monitoring system. The aggregation systems are described at paragraphs [0091] through [0097], as systems that receive hit level data from a website activity log, from a website filter, or from an instrumentation server, and gathers counts of various events in a tick accumulator. That is, such systems provide a count of a number of events that occur during a specified time period, or "tick" of a clock. Paragraph [0098] describes that the aggregation subsystems are connected to one or more web servers, and receive usage data from the web servers, with this data aggregated for a sample interval or tick. Hits are matched to monitored web pages or events by "matching the referring URL, the

URI-stem or the URI-query to the monitored web pages." Hits that match monitored web pages are combined for the tick.

As can be observed, this portion of Pulley contains no discussion of providing an embedded URL of an issue record. Pulley describes that URLs may be matched for purposes of monitoring website activity, with events related to a particular URL reported for purposes of monitoring a website. However, such matching and monitoring is quite different than issue tracking as claimed. As discussed above, claim 1 requires providing an issue record, and providing an embedded URL of the issue record. Nothing in the cited portion of Pulley is akin to an issue record, or providing an embedded URL of the issue record. In fact, an embedded URL is not provided at all, as Pulley simply monitors web traffic and matches various events related to web pages. To the extent that a URL is even used in Pulley, this information is not provided by Pulley, but is monitored for purposes of providing real-time information related to a website. Thus, the cited portion of Pulley does not teach or suggest providing a URL to any information or record.

Accordingly, it is submitted that the combination of Tran and Pulley does not render claim 1 obvious. As discussed, the Examiner has not provided articulated reasoning related to why one of skill in the art would combine these references. Even if the references were properly combinable, the combination does not teach the method as claimed. Thus, it is submitted that claim 1 is allowable over the cited references. Furthermore, claims 2-14 depend (directly or indirectly) from claim 1, and are also believed to be allowable at least because they depend from claim 1. These dependent claims may also include further bases for patentability, and the right to assert any such further basis for patentability in the future is reserved.

With respect to independent claims 15 and 31, these claims include similar limitations as described above with respect to claim 1, and it is submitted that each of these claims are also allowable for at least similar reasons as described above with respect to claim 1. These claims may also include further bases for patentability, and the right to assert any such further basis for patentability in the future is reserved. Furthermore, claims 16-30, and 32-33 are dependent from claims 15 and 31, respectfully, and by virtue of this dependency are also allowable for at least the same reasons as the independent claims from which they depend. These dependent claims

may also include further bases for patentability, and the right to assert any such further basis for patentability in the future is reserved.

## 2. Conclusion

In light of the above Remarks/Arguments, applicants respectfully request reconsideration of the present application and the issuance of a Notice of Allowance.

Respectfully submitted,

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